

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

ANDREW L. COLBORN,

Plaintiff,

vs.

**NETFLIX, INC.; CHROME MEDIA
LLC, F/K/A SYNTHESIS FILMS, LLC;
LAURA RICCIARDI; AND MOIRA
DEMOS,**

Defendants.

Civil No.: 19-CV-484-BHL



DECLARATION OF ISABELLA SALOMÃO NASCIMENTO

I, Isabella Salomão Nascimento, under penalty of perjury and subject to 28 U.S.C. § 1746, declare as follows:

1. I am one of the attorneys for Defendant Netflix, Inc., in the above-captioned action. I have personal knowledge of the matters set forth herein. I make this declaration in support of Netflix's Motion to Compel Production of Documents Responsive to Subpoena to Michael Griesbach (Dkt. 206).

2. Netflix submits this declaration with the attached documents, which show that Mr. Griesbach is in possession of non-privileged communications relating to the issues in this case.

3. In the course of discovery, Netflix learned that Plaintiff Andrew Colborn worked closely with two individuals, Brenda Schuler and Shawn Rech of Transitions Studios LLC, in

connection with the production of documentary called *Convicting a Murderer*, which is a “counter-documentary” to *Making a Murderer*.

4. Attached hereto as Exhibit 1 is a true and correct copy of a document produced in discovery by Plaintiff Andrew Colborn bates stamped COLBORN-004888. [REDACTED]

[REDACTED]

5. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6. Attached hereto as Exhibit 2 is a true and correct copy of a document produced by Plaintiff Andrew Colborn bates stamped COLBORN-004593. [REDACTED]

[REDACTED]

[REDACTED]

7. Ms. Schuler also assisted Mr. Colborn’s legal team by providing to his counsel, including Mr. Griesbach, information gathered in the course of the production of *Convicting a Murderer* that is relevant to the claims at issue in this lawsuit.

8. For example, attached hereto as Exhibits 3 and 4 are true and correct copies of documents produced by Plaintiff Andrew Colborn bates stamped COLBORN-002807 and COLBORN-004611, respectively. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

9. Finally, attached hereto as Exhibit 5 is a true and correct copy of a document produced by Plaintiff Andrew Colborn bates stamped COLBORN-004649. This document memorializes an email exchange between Mr. Griesbach, Mr. Colborn, and Ms. Schuler.

10. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13. Netflix believes that Mr. Griesbach is likely in possession, custody, or control of other emails like those referenced herein and that such emails are subject to discovery for the reasons explained in Netflix's initial memorandum and reply brief.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 26, 2022

/s/ Isabella Salomão Nascimento
Isabella Salomão Nascimento